

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re:

Fozi Naser

Debtor.

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: **Case No.: 22-01854**
: **Chapter 13**
: **Judge Carol A. Doyle**
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**OBJECTION OF U.S. BANK N.A., AS TRUSTEE, ON BEHALF OF THE HOLDERS OF
THE J.P. MORGAN MORTGAGE ACQUISITION TRUST 2006-HE3 ASSET BACKED
PASS-THROUGH CERTIFICATES, SERIES 2006-HE3 TO THE CONFIRMATION OF
THE PLAN (DOCKET NUMBER 7)**

U.S. Bank N.A., as trustee, on behalf of the holders of the J.P. Morgan Mortgage Acquisition Trust 2006-HE3 Asset Backed Pass-Through Certificates, Series 2006-HE3 ("Creditor") by and through its undersigned counsel, objects to the confirmation of the currently proposed plan ("Plan") filed by Fozi Naser ("Debtor") as follows:

1. Creditor holds a security interest secured by a mortgage lien on Debtor's property commonly known as 7505 Kenneth Avenue, Skokie, IL 60076 ("Property").
2. Creditor intends to file a Proof of Claim.
3. Debtor's Plan fails to properly provide for Creditor's secured claim.
4. Upon information and belief, Debtor still holds an interest in the Property.
5. Creditor objects to Debtor's plan as it does not provide clear information on how the ongoing monthly mortgage payment will be made – whether through the Trustee conduit or by the Debtor directly.

6. As a result, Debtor's Plan fails to meet the requirements of 11 U.S.C. §1325(a)(5) as it fails to properly provide for a secured claim. Creditor requests that Debtor amend the Plan to either provide for or surrender Creditor's claim.

WHEREFORE, Creditor respectfully requests that the Court deny the confirmation of the Debtor's currently proposed Plan.

Respectfully submitted,

/s/ Todd J. Ruchman

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Attorneys for Creditor

The case attorney for this file is Todd J. Ruchman.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Objection of U.S. Bank N.A., as trustee, on behalf of the holders of the J.P. Morgan Mortgage Acquisition Trust 2006-HE3 Asset Backed Pass-Through Certificates, Series 2006-HE3 to the Confirmation of the Original Plan was served on the parties listed below via e-mail notification:

Office of U.S. Trustee, Party of Interest, (Registered address)@usdoj.gov

Thomas H Hooper, Office of the Chapter 13 Trustee, 55 E. Monroe St., Chicago, IL 60603, ecf@tvch13.net

David Freydin, Attorney for Fozi Naser, Law Offices of David Freydin Ltd, 8707 Skokie Blvd, Suite 312, Skokie, IL 60077, david.freydin@freydinlaw.com

The below listed parties were served via regular U.S. Mail, postage prepaid, on March 1, 2022:

Fozi Naser, 7505 Kenneth Ave., Skokie, IL 60076

/s/ Todd J. Ruchman
